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FEDERAL COMMUNICATIONS COMMISSION

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RM-11140

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In the Matter of

Federal Communication Commission; MM Docket No. MB 05-10

Amendment of Section 73.202(b), Table of Allotments

**FM Broadcast Stations** (Monument, Oregon)

To:

Chief, Allocations Branch Policy and Rules Division

Media Bureau

### **COUNTERPROPOSAL AND REQUEST FOR SHOW CAUSE**

SSR Communications Incorporated ("SSR") hereby submits this Counterproposal and Request for a Show Cause Order in the above-mentioned proceeding, to (1) assign FM Channel 280C (in lieu of the Klickitat Broadcasting proposal for FM Channel 266A) to Monument, Oregon, as that community's first FM broadcast service; (2) add FM Channel 265C to Prairie City, Oregon, as that community's first commercial FM broadcast service; (3) substitute vacant FM Channel 247C1 for FM Channel 281C1 at Weiser, Idaho; (4) substitute FM Channel 282C2 for FM Channel 281C2 for station KWPK at Sisters, Oregon, by way of an Order to Show Cause to Thunderegg Wireless, L.L.C. (licensee of KWPK), directing KWPK to commence operation on a new channel; and, (5) add FM Channel 267C1 to Prineville, Oregon, as that community's second competing FM broadcast service, as follows:

| City                 | <u>Present</u>   | Proposed            |
|----------------------|------------------|---------------------|
| Monument, Oregon     | 266A (see 05-10) | 280C                |
| Prairie City, Oregon |                  | 265C                |
| Weiser, Idaho        | 280C1            | 247C1               |
| Sisters, Oregon      | 281C2            | 282C2               |
| Prineville, Oregon   | 255C3, 271C3     | 255C3, 267C1, 271C3 |

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This composition of allocations would characterize a *preferential arrangement of the FM Table of Allotments*. As the original petitioner (Klickitat) only proposes a Class A facility, SSR's counterproposal would bring superior Class C, 100,000-Watt service to Monument. Additionally, FM Channels 265C at Prairie City and 267C1 at Prineville are mutually exclusive with the Klickitat petition. The Notice of Proposed Rulemaking (NPRM) for MB Docket No. 05-10 seeks comments related to the use of FM Channel 266A at Monument. Thus, SSR respectfully requests that the Commission consider its arrangement of allotments as a counterproposal to MB Docket No. 05-10. SSR also expresses its interest in the three proposed vacant allotments contained herein, and intends to file applications (Form 301) for Construction Permits to operate new FM broadcast stations at Monument, Oregon, Weiser, Idaho, and Prineville, Oregon, and, if authorized, will build out the stations promptly.

SSR believes that it has brought forth a superior counterproposal to the Commission with the addition of FM Channel 280C to Monument, over the Klickitat's proposed FM Channel 266A facility. If the original petitioner is particularly interested in a Class A facility, however, SSR would submit that there are many alternate Class A facilities available to Monument (for example, FM Channels 224A, 237A, 245A, and 247A are all potential candidates; see attached Engineering Exhibit 6 for more information). After a careful study of economic feasibility and terrain impediments to line of sight signal coverage, however, SSR believes that full Class C facilities at Monument and Prairie are would provide those communities with the best possible FM service, as would a Class C1 facility at Prineville.

### REQUEST FOR ORDER TO SHOW CAUSE

In order to facilitate its Counterproposal, SSR respectfully requests that the Commission issue an Order to Show Cause to Thunderegg Wireless, L.L.C., licensee of station KWPK at Sisters, Oregon, stating why KWPK should not be modified to operate on its first adjacent channel, or to cease broadcasting on FM Channel 281C2 and renew operation on FM Channel 282C2. SSR states that, should it become the successful applicant for FM Channel 280C at Prairie City, it will reimburse Thunderegg Wireless, L.L.C. for all of its verifiable, legitimate, and prudent expenses related to the change in its facility, including, but not limited to, transmission facilities, stationary, imaging, et cetera. Concurrent with its submission to the Commission, copies of this document have been served on Thunderegg Wireless, L.L.C., and Horizon Broadcasting, L.L.C., by first class U.S. Mail, postage prepaid, to the following addresses:

Thuderegg Wireless, L.L.C. C/O Steven Seward 1500 4<sup>th</sup> Avenue Suite 600 Seattle, Washington 98101-1670

with Copies to:

Horizon Broadcasting Group, L.L.C. 2484 North Hosmer Lake Drive Bend, Oregon 97701

(Pending assignee to the KWPK license)

Note: the proposed modification of KWPK can be made upon consideration of the Auburn, Alabama decision (MB Docket No: 01-104). This Order to Show Cause is necessary to make an allotment in SSR's Counterproposal. See more details below.

### **IMPLEMENTATION**

Allocation studies demonstrate how the proposed new allotments are related.

SSR first proposes to allocate FM Channel 265C to Prairie City as that community's first commercial FM broadcast service. Prairie City is a bona-fide community for allotment purposes. As of the 2000 U.S. Census, there were 1,080 persons living within the incorporated city limits of Prairie City. Prairie City has its own municipal government,

city hall, police department, fire department, school district, private school, numerous churches, and U.S. Post Office (zip code point: 97869). These indicia are generally enough to prove worthiness of an allotment. FM Channel 265C would provide Prairie City with its first full-powered community radio voice. There are many natural terrain sites near Prairie City that would support a full Class C operation without the need to construct 600 Meter tower. FM Channel 265C is mutually exclusive with the Klickitat proposal to bring FM Channel 266A to Monument, hence SSR's request for the Commission to instead add FM Channel 280C to Monument.

FM Channel 280C can be allotted to Monument (in lieu of FM Channel 266A) with a Class C facility, providing maximum coverage to the community and also having line of sight signal propagation. This change also requires the substitution of FM Channel 282C2 for 281C2 for station KWPK at Sisters, Oregon. Even though there is an apparent shortspacing to station KMCQ on FM Channel 283C at The Dalles, Oregon at this site, it need not be considered under the Commission's Auburn, Alabama decision (see MB Docket No. 01-104).

Lastly, as a result of substituting FM Channel 280C for FM Channel 266A (and any other Class A facility that the Commission may consider, such as FM Channels 224A, 237A, 245A, or 247A) at Monument, FM Channel 267C1 can be allotted to Prineville, Oregon, as a new local service.

### **CONCLUSION**

SSR has timely filed its counterproposal for MB Docket No. 05-10, as the last day for comments on the matter is March 21, 2005.

In the event that the Commission grants SSR's counterproposal, SSR asserts that it will file applications (Form 301) for Construction Permits to operate new FM broadcast stations at Monument, Oregon, Weiser, Idaho, and Prineville, Oregon, and, if authorized, will build out the stations promptly.

Dated: March 21, 2005

SSR Communications Incorporated 5270 West Jones Bridge Road Norcross, GA 30092-1628 (770) 447-0026

Respectfully submitted,

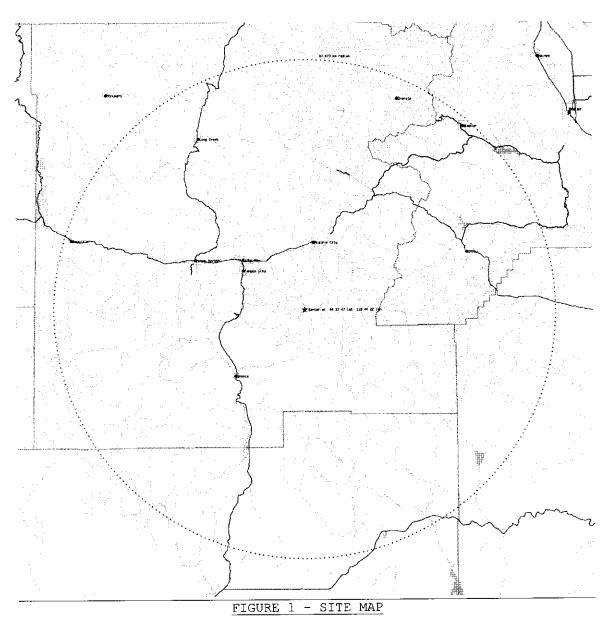
SSR Communications Incorporated

Matthew X. Wesdoud

By:

Matthew K. Wesolowski Chief Executive Officer

EXHIBIT 1
Site Map and Separation Requirements: 265C at Prairie City, OR



Proposed Channel 265C (100.9 MHz) 70 dBu Contour Prairie City, OR

### TABLE 1 - ALLOCATION STUDY

## ALL DISTANCES GIVEN IN KILOMETERS

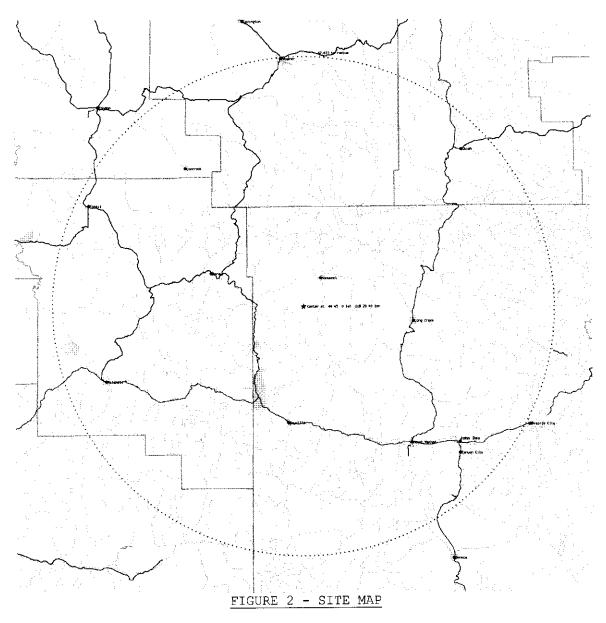
Proposed Allotment: Praire City, Oregon
Channel: 265 C
Coordinates: 44-17-47 N (NAD27)
118-44-22 W (NAD27)

| CDBs<br>Application<br>Number | Callsign | Record<br>Type | Channel<br>/ Class | Community     | State | Distance (km) | Minimum<br>Distance<br>per<br>73.207b1<br>(km) | Margin<br>(km) |
|-------------------------------|----------|----------------|--------------------|---------------|-------|---------------|--|----------------|
| 1038211                       |          | PROP AL        | 266 A              | MONUMENT      | OR    | 79.39         | 165,00   | -85.61         |
| 289695                        | KMGX     | LIC            | 264 C1             | BEND          | OR    | 208.57        | 209.00   | -0,43          |
| 293974                        |          | USED AL        | 264 C1             | BEND          | OR    | 208.57        | 209.00   | -0.43          |
| 153981                        | KMCL-FM  | LIC            | 266 C1             | MCCALL        | ID    | 208.60        | 209.00   | -0.40          |
| 609398                        |          | PROP AL        | 264 C2             | COLLEGE PLACE | WA    | 192.89        | 188.00   | 4.89           |
| 295615                        |          | USED AL        | 265 C2             | GRANDVIEW     | WA    | 256.94        | 249.00   | 7.94           |
| 290014                        |          | USED AL        | 264 C3             | WALLA WALLA   | WA    | 184.21        | 176.00   | 8.21           |
| 299397                        |          | USED AL        | 266 C1             | MCCALL        | ID    | 220.31        | 209.00   | 11.31          |
| 255397                        | KARY-FM  | LIC            | 265 C2             | GRANDVIEW     | WA    | 262.78        | 249.00   | 13.78          |
| 252560                        | KHSS     | LIC            | 264 C3             | WALLA WALLA   | WA    | 192.89        | 176.00   | 16.89          |
|                               | T        | PROP AL        | 267 C1             | PRINEVILLE    | OR    | 130.57        | 105.00   | 25.57          |
| 293817                        |          | USED AL        | 262 C1             | PAYETTE       | ID    | 148.77        | 105.00   | 43.77          |
| 256505                        | KISY     | LIC            | 264 C              | GOODING       | ID    | 290.44        | 241.00   | 49.44          |
| 428359                        |          | USED AL        | 265 C1             | MALIN         | OR    | 334.05        | 270.00   | 64.05          |
| 401611                        | KBUG     | APP            | 265 C1             | MALIN         | OR    | 339.14        | 270.00   | 69.14          |
| 300817                        |          | USED AL        | 264 C              | GOODING       | ID    | 311.21        | 241.00   | 70.21          |
| 606870                        | KQXR     | LIC            | 262 C1             | PAYETTE       | ID    | 186.30        | 105.00   | 81.30          |
| 285321                        | KQFM     | LIC            | 263 A              | HERMISTON     | OR    | 180.12        | 95.00  | 85.12          |
| 289404                        |          | USED AL        | 263 A              | HERMISTON     | OR    | 180.16        | 95.00  | 85.16          |
| 609405                        |          | PROP AL        | 263 C2             | ARLINGTON     | OR    | 195.39        | 105.00   | 90.39          |
| 249279                        | KUFO-FM  | LIC            | 266 C              | PORTLAND      | OR    | 343.30        | 241.00   | 102.30         |
| 294196                        |          | USED AL        | 266 C              | PORTLAND      | OR    | 343.30        | 241.00   | 102.30         |
| 991772                        | KTVR-FM  | LIC            | 212 C2             | LA GRANDÊ     | OR    | 137.93        | 35.00  | 102.93         |
| 422282                        | KGDN     | LIC            | 267 C3             | PASCO         | WA    | 203.20        | 96.00  | 107.20         |
| 298799                        |          | USED AL        | 267 C3             | PASCO         | WΑ    | 216.80        | 96.00  | 120,80         |
| 498086                        |          | PROP AL        | 265 A              | KENO          | OR    | 354.04        | 226.00   | 128.04         |
| 291458                        |          | VAC AL         | 268 C3             | THE DALLES    | OR    | 232.49        | 96.00  | 136.49         |
| 1020548                       |          | VAC AL         | 268 C3             | THE DALLES    | OR    | 232.49        | 96.00  | 136.49         |
| 282148                        | KEYF-FM  | LIC            | 266 C              | CHENEY        | WA    | 383.13        | 241.00   | 142.13         |

 $<sup>^{</sup>m Note-1}$  It is proposed that channel 280C be substituted for channel 266A for this proposed allotment in Monument, OR to resolve this short-spacing. (See Exhibit II.)

 $<sup>^{\</sup>rm H.C.}$  See Exhibit V.

EXHIBIT 2
Site Map and Separation Requirements: 280C at Monument, OR



Proposed Channel 280C (103.9 MHz) 70 dBu Contour

Monument, OR

### TABLE 2 - ALLOCATION STUDY

### ALL DISTANCES GIVEN IN KILOMETERS

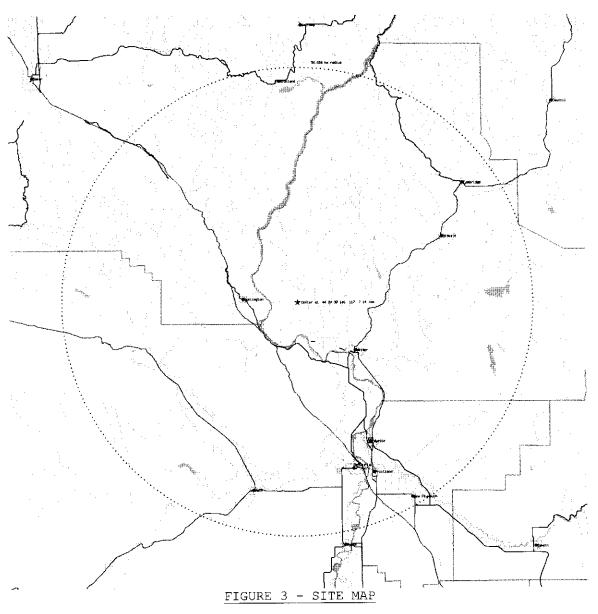
Proposed Allotment: Monument, Oregon Channel: 280 C Coordinates: 44~45-00 N (NA 119~28-40 W (NAD27)

| CDBS<br>Application<br>Number | Callsign   | Record<br>Type | Channel<br>/ Class | Community   | State | Distance (km) | Minimum<br>Distance<br>per<br>73.207b1<br>(km) | Margin<br>(km) |
|-------------------------------|------------|----------------|--------------------|-------------|-------|---------------|--|----------------|
| 496152                        |            | VAC AL         | 280 C1             | WEISER      | ID    | 192.68        | 270.00   | -77.32         |
| 500580                        |            | USED AL        | 281 C2             | SISTERS     | OR    | 165.38        | 188.00   | -22.62         |
| 564376                        | KWPK-FM    | LIC            | 281 C2             | SISTERS     | OR    | 165.38        | 188.00   | -22.62         |
| 601692                        | KXPC-FM    | CP             | 279 C              | LEBANON     | OR    | 240.58        | 241.00   | -0.42          |
| 295387                        |            | USED AL        | 281 C1             | YAKIMA      | WA    | 208.80        | 209.00   | -0.20          |
| 59 <b>4</b> 588               | KXDD       | LIC            | 281 Cl             | YAKIMA      | WA    | 208.80        | 209.00   | -0.20          |
| 615708                        |            | PROP AL        | 283 C2             | MORO        | OR    | 127.93        | 105.00   | 22.93          |
| 589130                        | Γ          | PROP AL        | 283 C1             | MORO        | OR    | 128.62        | 105.00   | 23.62          |
| 290830                        |            | USED AL        | 279 C              | LEBANON     | OR    | 277.55        | 241.00   | 36.55          |
| 196853                        | KXPC-FM    | LIC            | 279 C              | LEBANON     | OR    | 277.72        | 241.00   | 36.72          |
| 69884                         | KWHT       | LIC            | 278 C1             | PENDLETON   | OR    | 145.23        | 105.00   | 40.23          |
| 585293                        | KWHT       | CP             | 278 C1             | PENDLETON   | OR    | 145.25        | 105.00   | 40.25          |
| 586242                        |            | USED AL        | 278 C1             | PENDLETON   | OR    | 145.25        | 105.00   | 40.25          |
| 1038129                       |            | PROP AL        | 226 A              | IONE        | OR    | 87.83         | 29.00  | 58.83          |
|                               | KW PK - FM | PROP AL        | 282 C2             | SISTERS     | OR    | 165.38        | 105.00   | 60.38          |
| 285100                        | KMCQ       | LIC            | 283 C              | THE DALLES  | OR    | 167.17        | 105.00   | 62.17          |
| 295468                        | T          | USED AL        | 283 C              | THE DALLES  | OR    | 167.39        | 105.00   | 62.39          |
| 595835                        | KFIS       | LIC            | 281 C2             | SCAPPOOSE   | OR    | 266.09        | 188.00   | 78.09          |
| 295216                        |            | USED AL        | 279 C              | TACOMA      | AW    | 322.92        | 241.00   | 81,92          |
| 608515                        | KBBD       | LIC            | 280 C1             | SPOKANE     | WA    | 358.84        | 270.00   | 88.84          |
| 550849                        |            | USED AL        | 280 C1             | SPOKANE     | WA    | 360.85        | 270.00   | 90.85          |
| 508945                        | 1          | PROP AL        | 227 C3             | MADRAS      | OR    | 129.93        | 31.00  | 98.93          |
| 563047                        |            | USED AL        | 281 C2             | SCAPPOOSE   | OR    | 289.69        | 188.00   | 101.69         |
| 508951                        |            | PROP AL        | 227 A              | MADRAS      | OR    | 131.48        | 29.00  | 102.48         |
| 290962                        |            | USED AL        | 227 C1             | WALLA WALLA | WA    | 155.73        | 41.00  | 114.73         |
| 176451                        | KMTT       | LIC            | 279 C              | TACOMA      | WA    | 361.86        | 241.00   | 120.86         |
| 592908                        | KRKL       | LIC            | 227 C1             | WALLA WALLA | WA    | 171.39        | 41.00  | 130.39         |

 $<sup>^{\</sup>rm Norm\, I}$  It is proposed that channel 247C1 be substituted for channel 280C1 for this vacant allotment in Weiser, ID to resolve this short-spacing. (See Exhibit III.)

H: It is proposed that channel 282C2 be substituted for channel 281C2 for station KWPK-FM Sisters, OR to resolve this short-spacing. (See Exhibit IV.)

EXHIBIT 3
Site Map and Separation Requirements: 247C1 at Weisner, ID



Proposed Channel 247C1 (97.3 MHz) Weisn 70 dBu Contour

Weisner, ID

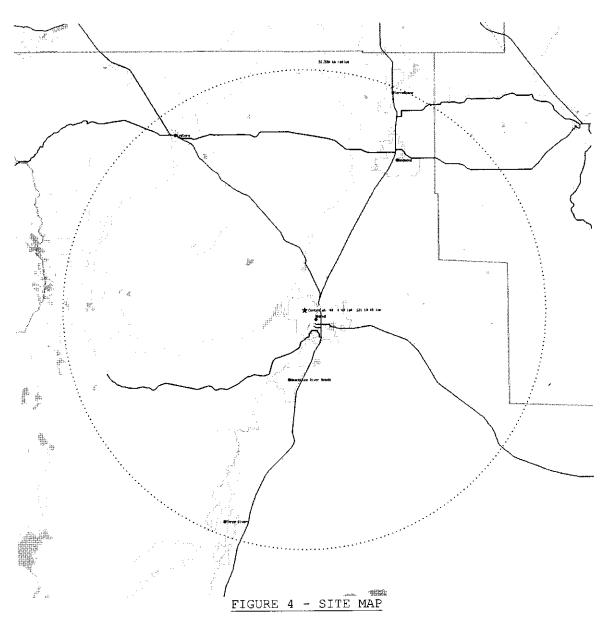
### TABLE 3 - ALLOCATION STUDY

# ALL DISTANCES GIVEN IN KILOMETERS

Proposed Allotment: Weiser, Idaho
Channel: 247 C1
Coordinates: 44-20-39 N (NAD27)
117-07-14 W

| CDBS<br>Application<br>Number | Callsign | Record<br>Type | Channel<br>/ Class | Community        | State |        | Minimum<br>Distance<br>per<br>73.207b1<br>(km) | Margin<br>(km) |
|-------------------------------|----------|----------------|--------------------|------------------|-------|--------|--|----------------|
| 292856                        |          | USED AL        | 250 C              | BOISE            | ID    | 104.74 | 105.00   | -0.26          |
| 586876                        | KQFC     | LIC            | 250 C              | BOISE            | ID    | 104.81 | 105.00   | -0.19          |
| 586878                        | KKGL     | LIC            | 245 C              | NAMPA            | ID    | 104.81 | 105.00   | -0.19          |
| 292443                        |          | USED AL        | 245 C              | NAMPA            | ID    | 104.88 | 105.00   | -0.12          |
| 684817                        | KXRX     | LIC            | 246 CO             | WALLA WALLA      | WA    | 200.07 | 196.00   | 4.07           |
| 201974                        | KXLT-FM  | LIC            | 300 C              | EAGLE            | ID    | 104.90 | 41.00  | 63.90          |
| 289567                        |          | USED AL        | 300 C              | EAGLE            | ID    | 104.90 | 41.00  | 63.90          |
| 694186                        |          | USED AL        | 248 C1             | BASIN CITY       | WA    | 272.59 | 177.00   | 95.59          |
| 998322                        |          | VAC AL         | 248 C1             | BASIN CITY       | WA    | 272.59 | 177.00   | 95.59          |
| 249860                        | KHTO     | LIC            | 250 C1             | MILTON-FREEWATER | OR    | 179.50 | 82.00  | 97.50          |
| 1044926                       | KHTO     | APP            | 250 C1             | MILTON-FREEWATER | OR    | 181,10 | 82.00  | 99.10          |
| 292591                        |          | USED AL        | 247 C              | BLACKFOOT        | ID    | 370.14 | 270.00   | 100.14         |
| 681016                        | KLCE     | LIC            | 247 C              | BLACKFOOT        | ID    | 370.14 | 270.00   | 100.14         |
| 299681                        | j        | USED AL        | 250 C1             | MILTON-FREEWATER | OR    | 184.78 | 82.00  | 102.78         |
| 998041                        | KOLW     | CP             | 248 C1             | BASIN CITY       | wA    | 281.76 | 177.00   |                |
| 607129                        |          | VAC AL         | 248 C2             | BASIN CITY       | WA    | 303.02 | 158.00   | 145.02         |

EXHIBIT 4
Site Map and Separation Requirements: 282C2 at Sisters, OR



Proposed Channel 282C2 (104.3 MHz) Sisters, OR 70 dBu Contour

### TABLE 4 - ALLOCATION STUDY

### ALL DISTANCES GIVEN IN KILOMETERS

Proposed Station: KWPK-FM Sisters, Oregon Channel: 282 C2
Coordinates: 44-04-40 N (NAD27)

121-19-49 W

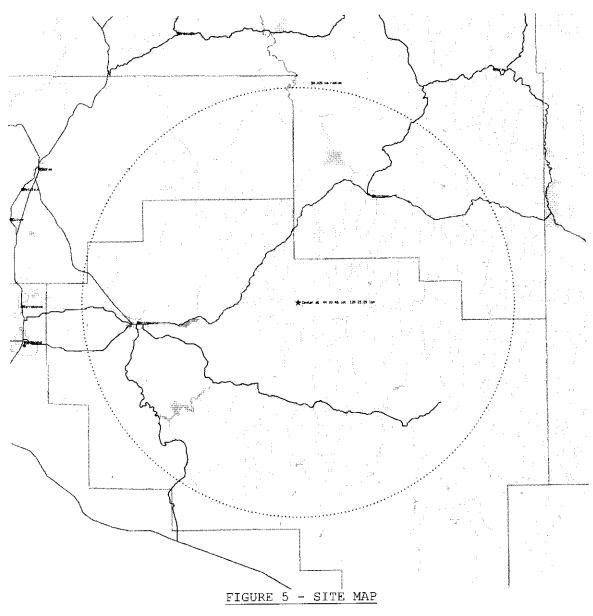
| CDBS<br>Application<br>Number | Callsign | Record<br>Type | Channel<br>/ Class | Community     | State | Distance (km) | Minimum<br>Distance<br>per<br>73.207bl<br>(km) | Margin<br>(km)       |
|-------------------------------|----------|----------------|--------------------|---------------|-------|---------------|--|----------------------|
| 500580                        | 1        | USED AL        | 281 C2             | SISTERS       | OR    | 0.00          | 130.00   | -130.00 N            |
| 564376                        | KWPK-FM  | LIC            | 281 C2             | SISTERS       | OR    | 0.00          | 130.00   | -130.00 No           |
| 295468                        |          | USED AL        | 283 C              | THE DALLES    | OR    | 182.31        | 188.00   | -5.69 N∷             |
| 285100                        | KMCQ     | LIC            | 283 C              | THE DALLES    | OR    | 182.44        | 188.00   | -5.56 <sup>x^1</sup> |
| 601692                        | KXPC-FM  | CP             | 279 C              | LEBANON       | OR    | 108.87        | 105.00   | 3.87                 |
| 589130                        |          | PROP AL        | 283 C1             | MORO          | OR    | 164.38        | 158.00   | 6.38                 |
| 290126                        | 1        | USED AL        | 282 C2             | TRI CITY      | OR    | 201.93        | 190.00   | 11.93                |
| 135314                        | KKMX     | LIC            | 282 C2             | TRI CITY      | OR    | 202.69        | 190.00   | 12.69                |
| 290830                        |          | USED AL        | 279 C              | LEBANON       | OR    | 138.33        | 105.00   | 33.33                |
| 615708                        |          | PROP AL        | 283 C2             | MORO          | OR    | 163.35        | 130.00   | 33.35                |
| 196853                        | KXPC-FM  | LIC            | 279 C              | LEBANON       | OR    | 138.53        | 105.00   | 33.53                |
| _                             |          | PROP AL        | 280 C              | MONUMENT      | OR    | 165.38        | 105.00   | 60.38 %              |
| 595835                        | KFIS     | LIC            | 281 C2             | SCAPPOOSE     | OR    | 190.39        | 130.00   | 60.39                |
| 711636                        | KDUK-FM  | LIC            | 284 C              | FLORENCE      | OR    | 178.10        | 105.00   | 73.10                |
| 295554                        |          | USED AL        | 284 C              | FLORENCE      | OR    | 184.10        | 105.00   | 79.10                |
| 611044                        |          | PROP AL        | 285 A              | FOSSIL        | OR    | 135.36        | 55.00  | 80.36                |
| 563047                        |          | USED AL        | 281 C2             | SCAPPOOSE     | OR    | 211.34        | 130.00   | 81.34                |
| 1035413                       | 1        | VAC AL         | 228 C1             | CONDON        | OR    | 145.70        | 27.00  | 118.70               |
| 295387                        | -        | USED AL        | 281 C1             | YAKIMA        | WA    | 280.32        | 158.00   | 122.32               |
| 594588                        | KXDD     | LIC            | 281 C1             | YAKIMA        | WA    | 280.32        | 158,00   | 122.32               |
| 1034707                       | NEW      | APP            | 228 C1             | CONDON        | OR    | 155.10        | 27.00  | 128.10               |
| 1038792                       | NEW      | APP            | 282 C3             | CHEHALIS      | WA    | 306.82        | 177,00   | 129.82               |
| 544607                        | KFEG     | LIC            | 284 C1             | KLAMATH FALLS | OR    | 209.79        | 79.00  | 130.79               |
| 289142                        |          | USED AL        | 284 C1             | KLAMATH FALLS | OR    | 210.37        | 79.00  | 131.37               |
| 1008870                       |          | APP            | 282 A              | CHEHALIS      | WA    | 304 36        | 166,00   | 138.36               |
| 1008879                       | 1        | APP            | 228 A              | CONDON        | OR    | 155.09        | 15.00  | 140.09               |
| 292924                        | 1        | VAC AL         | 228 A              | CONDON        | OR    | 157.75        | 15,00  | 142.75               |
| 1033025                       |          | APP            | 228 A              | CONDON        | OR    | 157.75        | 15.00  | 142.75               |
| 178380                        | KSHA     | LIC            | 282 C              | REDDING       | CA    | 392.75        | 249.00   | 143.75               |
| 295407                        | 1        | USED AL        | 282 C              | REDDING       | CA    | 392.75        | 249.00   | 143.75               |
| 527408                        |          | VAC AL         | 282 A              | CHEHALIS      | WA    | 313.20        | 166.00   | 147.20               |

Note 1 This exhibit proposes substitution of channel 282C2 for channel 281C2 for KWPK-FM Sisters,

Note 2 This apparent short-spacing of KMCQ is not considered because of Commission precedent set forth in MB Docket 01-104. The Commission modified the license of KMCQ to specify operation on channel 283C3 at Covington, WA in MB Docket 02-136.

<sup>&</sup>quot;' 'See Exhibit II.

EXHIBIT 5
Site Map and Separation Requirements: 267C1 at Prineville, OR



Proposed Channel 267C1 (101.3 MHz) Prineville, OR 70 dBu Contour

### TABLE 5 - ALLOCATION STUDY

### ALL DISTANCES GIVEN IN KILOMETERS

Proposed Allotment: Prineville, Oregon
Channel: 267 C1
Coordinates: 44-20-48 N (NAD27)
120-22-29 W

| CDBS<br>Application<br>Number | Callsign   | Record<br>Type | Channel<br>/ Class | Community   | State | Distance (km) | Minimum<br>Distance<br>per<br>73.207b1<br>(km) | Margin<br>(km) |
|-------------------------------|--|----------------|--------------------|-------------|-------|---------------|--|----------------|
| 1038211                       | <del>                                     </del> | PROP AL        | 266 A              | MONUMENT    | OR    | 92.25         | 133.00   | -40.75         |
| 291458                        |  | VAC AL         | 268 C3             | THE DALLES  | OR    | 143.59        | 144.00   | -0.41          |
| 1020548                       |  | VAC AL         | 268 C3             | THE DALLES  | OR    | 143.59        | 144.00   | -0.41          |
| 289695                        | KMGX   | LIC            | 264 CI             | BEND        | OR    | 82.01         | 82.00  | 0.01           |
| 293974                        |  | USED AL        | 264 C1             | BEND        | OR    | 82.01         | 82.00  | 0.01           |
| 284002                        | KLRR   | LIC            | 269 C2             | REDMOND     | OR    | 82.16         | 79.00  | 3.16           |
| 289677                        |  | VAC AL         | 269 C2             | REDMOND     | OR    | 82.16         | 79.00  | 3.16           |
| 300015                        |  | VAC AL         | 269 C2             | REDMOND     | OR    | 82.16         | 79.00  | 3.16           |
| 1022360                       | KLRR   | CP             | 269 C2             | REDMOND     | OR    | 82.18         | 79.00  | 3.18           |
| 422282                        | KGDN   | LIC            | 267 C3             | PASCO       | WA    | 215.46        | 211.00   | 4.46           |
| 298799                        |  | USED AL        | 267 C3             | PASCO       | WA_   | 228.15        | 211.00   | 17.15          |
| 249279                        | KUFO-FM  | LIC            | 266 C              | PORTLAND    | OR    | 227.05        | 209.00   | 18.05          |
| 294196                        |  | USED AL        | 266 C              | PORTLAND    | OR    | 227.05        |  | 18.05          |
| 289763                        | T  | VAC AL         | 268 C              | CORVALLIS   | OR    | 232.87        | 209.00   | 23.87          |
|                               |  | PROP AL        | 265 C              | PRAIRE CITY | OR    | 130.57        |  | 25.57          |
| 431019                        |  | USED AL        | 268 C1             | CORVALLIS   | OR    | 232.87        | 177.00   | 55.87          |
| 615585                        | KFLY   | LIC            | 268 CO             | CORVALLIS   | OR    | 252.46        |  | 56.46          |
| 671409                        | KVLB   | LIC            | 213 A              | BEND        | OR    | 81.99         | <u> </u>                                       | 59.99          |
| 1032660                       | KVLB   | APP            | 213 A              | BEND        | OR_   | 81.99         |  | 59.99          |
| 290648                        | I  | VAC AL         | 267 C              | ALTURAS     | CA    | 330.97        |  | 60.97          |
| 277325                        | KAVJ   | LIC            | 266 C3             | SUTHERLIN   | OR    | 262.89        |  | 118.89         |
| 299654                        | [  | USED AL        | 266 C3             | SUTHERLIN   | OR    | 262.89        |  |                |
| 1035430                       | KINK   | APP            | 270 C              | PORTLAND    | OR    | 227.05        |  | 122.05         |
| 499859                        | KINK-FM  | LIC            | 270 C              | PORTLAND    | OR    | 228,27        |  | 123.27         |
| 294519                        |  | USED AL        | 270 C              | PORTLAND    | OR    | 228.29        |  |                |
| 154423                        | KMNA   | LIC            | 269 C3             | PROSSER     | WA    | 210.22        |  |                |
| 298594                        |  | USED AL        | 269 C3             | PROSSER     | WA    | 210.22        | 76.00  | 134.22         |

Here: It is proposed that channel 280C be substituted for channel 266A for this proposed allotment in Monument, OR to resolve this short-spacing. (See Exhibit II.)

harry See Exhibit I.

#### **TABLE 6 - ALLOCATION STUDY**

### ALL DISTANCES GIVEN IN KILOMETERS

Possible Allotment: Monument, Oregon

Channel: 224 A

Coordinates: 44-49-10 N (NAD27)

119-25-12 W

| CDBS<br>Application<br>Number | Callsign | Record<br>Type | Channel<br>/ Class | Community   | State | Distance (km) | Minimum<br>Distance<br>per<br>73.207b1<br>(km) | Margin<br>(km) |
|-------------------------------|----------|----------------|--------------------|-------------|-------|---------------|--|----------------|
| 299372                        |          | USED AL        | 224 C3             | THE DALLES  | OR    | 162.49        | 142.00   | 20.49          |
| 253188                        | KQHC     | LIC            | 224 A              | BURNS       | OR    | 140.44        | 115.00   | 25.44          |
| 290704                        |          | USED AL        | 224 A              | BURNS       | OR    | 140.44        | 115.00   | 25.44          |
| 175721                        | KZHR     | LIC            | 223 C1             | DAYTON      | WA    | 162.46        | 133.00   | 29.46          |
| 614786                        | KMSW     | LIC            | 224 C3             | THE DALLES  | OR    | 172.20        | 142.00   | 30.20          |
| 289423                        |          | VAC AL         | 224 C2             | SUNRIVER    | OR    | 196.78        | 166.00   | 30.78          |
| 503878                        |          | VAC AL         | 221 C3             | PILOT ROCK  | OR    | 82.05         | 42.00  | 40.05          |
| 1038208                       |          | PROP AL        | 222 A              | IONE        | OR    | 81.23         | 31.00  | 50.23          |
| 1038129                       |          | PROP AL        | 226 A              | IONE        | OR    | 82.16         | 31.00  | 51.16          |
| 298492                        |          | USED AL        | 223 C1             | DAYTON      | WA    | 201.20        | 133.00   | 68.20          |
| 290962                        |          | USED AL        | 227 C1             | WALLA WALLA | ΑW    | 146.77        | 75.00  | 71.77          |
| 592908                        | KRKL     | LIC            | 227 C1             | WALLA WALLA | WA    | 162.46        | 75.00  | 87.46          |
| 508945                        |          | PROP AL        | 227 C3             | MADRAS      | OR    | 135.17        | 42.00  | 93.17          |
| 150072                        | KDBL     | LIC            | 225 C2             | TOPPENISH   | WA    | 202.00        | 106.00   | 96.00          |
| 290679                        |          | USED AL        | 225 C2             | TOPPENISH   | WA    | 202,00        | 106.00   | 96.00          |
| 508951                        |          | PROP AL        | 227 A              | MADRAS      | OR    | 136.91        | 31.00  |                |
| 69884                         | KWHT     | LIC            | 278 C1             | PENDLETON   | OR    | 136.30        | 22.00  | 114.30         |
| 585293                        | KWHT     | CP             | 278 C1             | PENDLETON   | OR    | 136.32        | 22.00  | <del></del>    |
| 586242                        |          | USED AL        | 278 C1             | PENDLETON   | OR    | 136.32        |  |                |
| 153381                        | KORT-FM  | LIC            | 224 C3             | GRANGEVILLE | ID    | 283.24        | 142.00   | <del></del>    |
| 292253                        |          | USED AL        | 224 C3             | GRANGEVILLE | ID    | 283.24        | 142.00   | 141.24         |

### **CERTIFICATION**

I certify that I have directly prepared or supervised the preparation of this entire document. I believe it to be accurate and true, to the best of my knowledge.

Date: March 21, 2005

Respectfully Submitted,
Matthew & Wasdowski

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